

EXHIBIT E

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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CAPITOL 7 FUNDING,

Plaintiff,

v.

WINGFIELD INVESTMENT CORPORATION,

Corporate Defendant,

BURGIS SETHNA, A/K/A SETH BURGESS,
HEATH WAGENHEIM, JOSEPH RABITO AND
DAMIAN LALJIE AND JOHN DOES 1
THROUGH 15,

Individual Defendants.

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ANSWER TO SECOND
AMENDED COMPLAINT

Docket No.
17-CV-2374(RRM)(ST)

Defendants, Joseph Rabito and Damian Laljie by their attorneys, The Law Office of Daniel L. Bibb, LLC, as and for its Answer to the Second Amended Complaint (hereafter referred to as “the complaint”), herein alleges as follows:

ANSWER TO NATURE OF THE ACTION

1. Denies each and every allegation set forth in paragraph 1 of the complaint.
2. Denies each and every allegation set forth in paragraph 2 of the complaint.
3. Denies any knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 3 of the complaint, except to the allegations set forth in paragraph 3 that state “the Defendants intended to use 3 Leaf as a vehicle from which to siphon money for their personal use, using Plaintiff’s initial investment in 3 Leaf as seed capital for their fraudulent scheme.” The Defendants deny these allegations.

4. Denies each and every allegation set forth in paragraph 4 of the complaint.
5. Denies each and every allegation set forth in paragraph 5 of the complaint.
6. Denies each and every allegation set forth in paragraph 6 of the complaint.
7. Denies each and every allegation set forth in paragraph 7 of the complaint.
8. Denies each and every allegation set forth in paragraph 8 of the complaint.
9. Denies each and every allegation set forth in paragraph 9 of the complaint.

ANSWER TO THE PARTIES

10. Denies any knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 10 of the complaint.
11. Denies any knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 11 of the complaint.
12. Admits the allegations made in paragraph 12 of the complaint.
13. Admits the allegations made in paragraph 13 of the complaint.
14. Denies any knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 14 of the complaint.
15. Denies any knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 15 of the complaint.
16. Admit she allegations contained in the first sentence and denies the allegations contained in the second sentence of paragraph 16.
17. Admits the allegations contained in the first sentence and denies the allegations contained in the second sentence of paragraph 17.
18. Denies each and every allegation set forth in paragraph 18 of the complaint.

III. ANSWER TO JURISDICTION, VENUE AND STATUTE OF LIMITATIONS

19. Denies knowledge or information sufficient to form a belief as to the law and facts of the allegations set forth in paragraph 19 of the Complaint.
20. Denies knowledge or information sufficient to form a belief as to the law and facts of the allegations set forth in paragraph 20 of the Complaint.
21. Denies knowledge or information sufficient to form a belief as to the law and the facts of the allegations set forth in paragraph 21 of the complaint.

ANSWER FOR FACTUAL BASIS FOR CLAIMS

22. Denies each and every allegation set forth in paragraph 22 of the complaint.

ANSWER TO THE INCORPORATION OF THE 3 LEAF JOINT VENTURE

23. Denies any knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 23 of the complaint.
24. Denies any knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 24 of the complaint.
25. Denies any knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 25 of the complaint.

ANSWER AS TO THE INTENDED OPERATION OF 3 LEAF

26. Denies each and every allegation set forth in paragraph 26 of the complaint.
27. Denies each and every allegation set forth in paragraph 27 of the complaint.
28. Denies each and every allegation set forth in paragraph 28 of the complaint.
29. Denies each and every allegation set forth in paragraph 29 of the complaint.
30. Denies each and every allegation set forth in paragraph 30 of the complaint.

31. Denies each and every allegation set forth in paragraph 31 of the complaint.

32. Denies each and every allegation set forth in paragraph 32 of the complaint.

33. Denies each and every allegation set forth in paragraph 33 of the complaint.

34. Denies each and every allegation set forth in paragraph 34 of the complaint.

**ANSWER AS TO THE OVERVIEW OF DEFENDANT'S FRAUDULENT
SCHEME**

35. Denies each and every allegation set forth in paragraph 35 of the complaint.

36. Denies each and every allegation set forth in paragraph 36 of the complaint.

37. Denies each and every allegation set forth in paragraph 37 of the complaint.

38. Denies each and every allegation set forth in paragraph 38 of the complaint.

39. Denies each and every allegation set forth in paragraph 39 of the complaint.

40. Denies each and every allegation set forth in paragraph 40 of the complaint.

41. Denies each and every allegation set forth in paragraph 41 of the complaint.

42. Denies each and every allegation set forth in paragraph 42 of the complaint.

43. Denies each and every allegation set forth in paragraph 43 of the complaint.

44. Denies each and every allegation set forth in paragraph 44 of the complaint.

45. Denies each and every allegation set forth in paragraph 45 of the complaint.

46. Denies each and every allegation set forth in paragraph 46 of the complaint.

47. Denies each and every allegation set forth in paragraph 47 of the complaint.

48. Denies each and every allegation set forth in paragraph 48 of the complaint.

49. Denies each and every allegation set forth in paragraph 49 of the complaint.

50. Denies each and every allegation set forth in paragraph 50 of the complaint.

51. Denies each and every allegation set forth in paragraph 51 of the complaint.

52. Denies each and every allegation set forth in paragraph 52 of the complaint.

53. Denies each and every allegation set forth in paragraph 53 of the complaint.

54. Denies each and every allegation set forth in paragraph 54 of the complaint.

55. Denies each and every allegation set forth in paragraph 55 of the complaint.

56. Denies each and every allegation set forth in paragraph 56 of the complaint.

57. Denies each and every allegation set forth in paragraph 57 of the complaint.

58. Denies each and every allegation set forth in paragraph 58 of the complaint.

59. Denies each and every allegation set forth in paragraph 59 of the complaint.

ANSWER AS TO DEFENDANTS' VIOLATION OF THE RICO ACT

60. Denies each and every allegation set forth in paragraph 60 of the complaint.

61. Denies each and every allegation set forth in paragraph 61 of the complaint.

62. Denies each and every allegation set forth in paragraph 62 of the complaint.

63. Denies each and every allegation set forth in paragraph 63 of the complaint.

64. Denies each and every allegation set forth in paragraph 64 of the complaint.

65. Denies each and every allegation set forth in paragraph 65 of the complaint.

66. Denies each and every allegation set forth in paragraph 66 of the complaint.

67. Nothing is contained in paragraph 67 of the complaint so there is nothing to admit or deny.

68. Denies each and every allegation set forth in paragraph 68 of the complaint.

69. Denies each and every allegation set forth in paragraph 69 of the complaint.

70. Denies each and every allegation set forth in paragraph 70 of the complaint.

71. Denies each and every allegation set forth in paragraph 71 of the complaint.

72. Denies each and every allegation set forth in paragraph 72 of the complaint.

73. Denies each and every allegation set forth in paragraph 73 of the complaint.

- 74. Denies each and every allegation set forth in paragraph 74 of the complaint.
- 75. Denies each and every allegation set forth in paragraph 75 of the complaint.
- 76. Denies each and every allegation set forth in paragraph 76 of the complaint.
- 77. Denies each and every allegation set forth in paragraph 77 of the complaint.
- 78. Denies each and every allegation set forth in paragraph 78 of the complaint.
- 79. Denies each and every allegation set forth in paragraph 79 of the complaint.
- 80. Denies each and every allegation set forth in paragraph 80 of the complaint.
- 81. Denies each and every allegation set forth in paragraph 81 of the complaint.
- 82. Denies each and every allegation set forth in paragraph 82 of the complaint.
- 83. Denies each and every allegation set forth in paragraph 83 of the complaint.
- 84. Denies each and every allegation set forth in paragraph 84 of the complaint.
- 85. Denies each and every allegation set forth in paragraph 85 of the complaint.
- 86. Denies each and every allegation set forth in paragraph 86 of the complaint.

**ANSWER TO DEFENDANTS' SPECIFIC TRANSACTIONS AND
PATTERN OF RACKETEERING ACTIVITY**

- 87. Denies each and every allegation set forth in paragraph 87 of the complaint.
- 88. Denies each and every allegation set forth in paragraph 88 of the complaint.
- 89. Denies each and every allegation set forth in paragraph 89 of the complaint.
- 90. Denies each and every allegation set forth in paragraph 90 of the complaint.
- 91. Denies each and every allegation set forth in paragraph 91 of the complaint.
- 92. Denies each and every allegation set forth in paragraph 92 of the complaint.
- 93. Denies each and every allegation set forth in paragraph 93 of the complaint.
- 94. Denies each and every allegation set forth in paragraph 94 of the complaint.
- 95. Denies each and every allegation set forth in paragraph 95 of the complaint.

96. Denies each and every allegation set forth in paragraph 96 of the complaint.
97. Denies each and every allegation set forth in paragraph 97 of the complaint.
98. Denies each and every allegation set forth in paragraph 98 of the complaint.
99. Denies each and every allegation set forth in paragraph 99 of the complaint.
100. Denies each and every allegation set forth in paragraph 100 of the complaint.
101. Denies each and every allegation set forth in paragraph 101 of the complaint.
102. Denies each and every allegation set forth in paragraph 102 of the complaint.
103. Denies each and every allegation set forth in paragraph 103 of the complaint.
104. Denies each and every allegation set forth in paragraph 104 of the complaint.
105. Denies each and every allegation set forth in paragraph 105 of the complaint.
106. Denies each and every allegation set forth in paragraph 106 of the complaint.
107. Denies each and every allegation set forth in paragraph 107 of the complaint.
108. Denies each and every allegation set forth in paragraph 108 of the complaint.
109. Denies each and every allegation set forth in paragraph 109 of the complaint.
110. Denies each and every allegation set forth in paragraph 110 of the complaint.
111. Denies each and every allegation set forth in paragraph 111 of the complaint.
112. Denies each and every allegation set forth in paragraph 112 of the complaint.
113. Denies each and every allegation set forth in paragraph 113 of the complaint.
114. Denies each and every allegation set forth in paragraph 114 of the complaint.
115. Denies each and every allegation set forth in paragraph 115 of the complaint.
116. Denies each and every allegation set forth in paragraph 116 of the complaint.
117. Denies each and every allegation set forth in paragraph 117 of the complaint.
118. Denies each and every allegation set forth in paragraph 118 of the complaint.

119. Denies each and every allegation set forth in paragraph 119 of the complaint.
120. Denies each and every allegation set forth in paragraph 120 of the complaint.
121. Denies each and every allegation set forth in paragraph 121 of the complaint.
122. Denies each and every allegation set forth in paragraph 122 of the complaint.
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128. Denies each and every allegation set forth in paragraph 128 of the complaint.
129. Denies each and every allegation set forth in paragraph 129 of the complaint.
130. Denies each and every allegation set forth in paragraph 130 of the complaint.
131. Denies each and every allegation set forth in paragraph 131 of the complaint.
132. Denies each and every allegation set forth in paragraph 132 of the complaint.
133. Denies each and every allegation set forth in paragraph 133 of the complaint.
134. Denies each and every allegation set forth in paragraph 134 of the complaint.
135. Denies each and every allegation set forth in paragraph 135 of the complaint.
136. Denies each and every allegation set forth in paragraph 136 of the complaint.
137. Denies each and every allegation set forth in paragraph 137 of the complaint.
138. Denies each and every allegation set forth in paragraph 138 of the complaint.
139. Denies each and every allegation set forth in paragraph 139 of the complaint.
140. Denies each and every allegation set forth in paragraph 140 of the complaint.
141. Denies each and every allegation set forth in paragraph 141 of the complaint.

142. Denies each and every allegation set forth in paragraph 142 of the complaint.
143. Denies each and every allegation set forth in paragraph 143 of the complaint.
144. Denies each and every allegation set forth in paragraph 144 of the complaint.
145. Denies each and every allegation set forth in paragraph 145 of the complaint.
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- 234. Denies each and every allegation set forth in paragraph 234 of the complaint.
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- 240. Denies each and every allegation set forth in paragraph 240 of the complaint.
- 241. Denies each and every allegation set forth in paragraph 2241 of the complaint.
- 242. Denies each and every allegation set forth in paragraph 242 of the complaint.
- 243. Denies each and every allegation set forth in paragraph 243 of the complaint.
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- 256. Denies each and every allegation set forth in paragraph 256 of the complaint.

- 257. Denies each and every allegation set forth in paragraph 257 of the complaint.
- 258. Denies each and every allegation set forth in paragraph 258 of the complaint.
- 259. Denies each and every allegation set forth in paragraph 259 of the complaint.
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- 261. Denies each and every allegation set forth in paragraph 261 of the complaint.
- 262. Denies each and every allegation set forth in paragraph 262 of the complaint.
- 263. Denies each and every allegation set forth in paragraph 263 of the complaint.
- 264. Denies each and every allegation set forth in paragraph 264 of the complaint.
- 265. Denies each and every allegation set forth in paragraph 265 of the complaint.
- 266. Denies each and every allegation set forth in paragraph 267 of the complaint.
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- 268. Denies each and every allegation set forth in paragraph 268 of the complaint.
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- 271. Denies each and every allegation set forth in paragraph 271 of the complaint.
- 272. Denies each and every allegation set forth in paragraph 272 of the complaint.
- 273. Denies each and every allegation set forth in paragraph 273 of the complaint.
- 274. Denies each and every allegation set forth in paragraph 274 of the complaint.
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- 280. Denies each and every allegation set forth in paragraph 280 of the complaint.
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- 295. Denies each and every allegation set forth in paragraph 295 of the complaint.
- 296. Denies each and every allegation set forth in paragraph 296 of the complaint.
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- 298. Denies each and every allegation set forth in paragraph 298 of the complaint.
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- 301. Denies each and every allegation set forth in paragraph 301 of the complaint.
- 302. Denies each and every allegation set forth in paragraph 302 of the complaint.

- 303. Denies each and every allegation set forth in paragraph 303 of the complaint.
- 304. Denies each and every allegation set forth in paragraph 101 of the complaint.
- 305. Denies each and every allegation set forth in paragraph 305 of the complaint.
- 306. Denies each and every allegation set forth in paragraph 306 of the complaint.
- 307. Denies each and every allegation set forth in paragraph 307 of the complaint.
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- 323. Denies each and every allegation set forth in paragraph 323 of the complaint.
- 324. Denies each and every allegation set forth in paragraph 296 of the complaint.
- 325. Denies each and every allegation set forth in paragraph 325 of the complaint.

- 326. Denies each and every allegation set forth in paragraph 326 of the complaint.
- 327. Denies each and every allegation set forth in paragraph 327 of the complaint.
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- 391. Denies each and every allegation set forth in paragraph 391 of the complaint.
- 392. Denies each and every allegation set forth in paragraph 392 of the complaint.
- 393. Denies each and every allegation set forth in paragraph 393 of the complaint.
- 394. Denies each and every allegation set forth in paragraph 394 of the complaint.

- 395. Denies each and every allegation set forth in paragraph 395 of the complaint.
- 396. Denies each and every allegation set forth in paragraph 396 of the complaint.
- 397. Denies each and every allegation set forth in paragraph 397 of the complaint.
- 398. Denies each and every allegation set forth in paragraph 398 of the complaint.
- 399. Denies each and every allegation set forth in paragraph 399 of the complaint.
- 400. Denies each and every allegation set forth in paragraph 400 of the complaint.
- 401. Denies each and every allegation set forth in paragraph 401 of the complaint.
- 402. Denies each and every allegation set forth in paragraph 402 of the complaint.
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- 407. Denies each and every allegation set forth in paragraph 407 of the complaint.
- 408. Denies each and every allegation set forth in paragraph 408 of the complaint.
- 409. Denies each and every allegation set forth in paragraph 409 of the complaint.
- 410. Denies each and every allegation set forth in paragraph 410 of the complaint.
- 411. Denies each and every allegation set forth in paragraph 411 of the complaint.
- 412. Denies each and every allegation set forth in paragraph 412 of the complaint.
- 413. Denies each and every allegation set forth in paragraph 413 of the complaint.
- 414. Denies each and every allegation set forth in paragraph 414 of the complaint.
- 415. Denies each and every allegation set forth in paragraph 415 of the complaint.
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- 418. Denies each and every allegation set forth in paragraph 418 of the complaint.
- 419. Denies each and every allegation set forth in paragraph 419 of the complaint.
- 420. Denies each and every allegation set forth in paragraph 420 of the complaint.
- 421. Denies each and every allegation set forth in paragraph 421 of the complaint.
- 422. Denies each and every allegation set forth in paragraph 422 of the complaint.
- 423. Denies each and every allegation set forth in paragraph 423 of the complaint.
- 424. Denies each and every allegation set forth in paragraph 424 of the complaint.

ANSWER AS TO THE CAUSES OF ACTION

- 425. Denies each and every allegation set forth in paragraph 425 of the complaint.
- 426. Denies each and every allegation set forth in paragraph 426 of the complaint.
- 427. Denies each and every allegation set forth in paragraph 427 of the complaint.
- 428. Denies each and every allegation set forth in paragraph 428 of the complaint.
- 429. Denies each and every allegation set forth in paragraph 429 of the complaint.
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- 431. Denies each and every allegation set forth in paragraph 431 of the complaint.
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- 433. Denies each and every allegation set forth in paragraph 433 of the complaint.
- 434. Denies each and every allegation set forth in paragraph 434 of the complaint.
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- 436. Denies each and every allegation set forth in paragraph 436 of the complaint.
- 437. Denies each and every allegation set forth in paragraph 437 of the complaint.
- 438. Denies each and every allegation set forth in paragraph 438 of the complaint.
- 439. Denies each and every allegation set forth in paragraph 439 of the complaint.

- 440. Denies each and every allegation set forth in paragraph 440 of the complaint.
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- 463. Denies each and every allegation set forth in paragraph 463 of the complaint.
- 464. Denies each and every allegation set forth in paragraph 464 of the complaint.
- 465. Denies each and every allegation set forth in paragraph 465 of the complaint.
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- 472. Denies each and every allegation set forth in paragraph 472 of the complaint.
- 473. Denies each and every allegation set forth in paragraph 473 of the complaint.
- 474. Denies each and every allegation set forth in paragraph 474 of the complaint.
- 475. Denies each and every allegation set forth in paragraph 475 of the complaint.

AFFIRMATIVE DEFENSES

- 476. As and for their affirmative defenses to the Complaint, the Defendants, by their undersigned attorneys, allege as follows:

FIRST AFFIRMATIVE DEFENSE

The Verified Complaint should be dismissed for failure to state a cause of action as against defendants Rabito and Laljie,

SECOND AFFIRMATIVE DEFENSE

Plaintiffs' claims fail because, at all times relevant hereto, the Defendants acted in

good faith and did not violate any right that may be secured to plaintiff under any federal, state or local laws, rules, regulations or guidelines. The claims alleged in the Complaint are barred as Defendants have fulfilled all of their obligations to plaintiffs, if any existed at all.

JURY DEMAND

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, the Defendants respectfully demand a trial by jury on any and all issues so triable.

WHEREFORE, the answering defendants demand a judgment against the Plaintiff as follows:

- (a) Dismissing the Complaint and each and every cause of action therein;
- (b) Awarding the Defendants their costs, reasonable attorney's fees and disbursements incurred in defending this action; and
- (c) Awarding Defendants such other and further relief as may be deemed just and proper.

Dated: New York, NY
January 23, 2021

Respectfully Submitted,

s/ Daniel L. Bibb
Daniel L. Bibb, Esq. (db8060)
The Law Office of Daniel L. Bibb, LLC
261 Madison Avenue, 12th Floor
New York, New York 10016